

From: [Ruhl, Christopher](#)
To: [Smith, Monica](#)
Subject: Re: West Fertilizer - West, TX Q&A
Date: Thursday, April 18, 2013 3:22:46 PM

Yep. Thx

From: Smith, Monica
Sent: Thursday, April 18, 2013 3:22:20 PM
To: Ruhl, Christopher
Subject: RE: West Fertilizer - West, TX Q&A

By the way, did you see email from connie overbay. No other enforcement actions

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From: Ruhl, Christopher
Sent: Thursday, April 18, 2013 3:21 PM
To: Eoc, Epahq
Cc: Gray, David; Edlund, Carl; Coleman, Sam; McQuiddy, David; Smith, Monica; Petersen, Chris; Broyles, Ragan; Webster, Susan
Subject: West Fertilizer - West, TX Q&A

1. What enforcement actions has EPA taken against this plant; how do we get a copy?

EPA conducted an inspection of the Risk Management Plan at West Chemical and Fertilizer on March 16, 2006, and found a number of deficiencies. EPA fined the facility \$2,300 on August 14, 2006, and directed the company to correct the deficiencies. The company certified they corrected the deficiencies. The facility, which is required by law to submit an updated plan at least every five years, submitted an updated plan in 2011.

The deficiencies identified by inspectors in 2006 included:

- Failure to update its RMP in a timely manner. The update was due in 2004, but wasn't updated until 2006.
- Failure to document that hazards identified in the hazard review had been addressed.
- Operating procedures failed to address consequences of deviation.
- Poor employee training records.
- The company had not developed a formal written maintenance program.



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The West Chemical and Fertilizer facility is subject to the Chemical Accident Prevention provisions at 40 CFR Part 68 because the quantity of ammonia on-site exceeds 10,000 lbs. The facility has not reported any major accident in the last five-years to EPA.

2. What is EPA doing on the scene for emergency response?

At the request of the state, and in coordination with FEMA and other federal agencies, EPA's Region 6 has deployed 4 OSCs, 8 contractors and the mobile command post to the site. Additional on-scene coordinators and contractors are on standby. Air monitoring will be conducted. The OSCs will coordinate with TCEQ and multiple state and local partners on the response.

3. In a sentence, what is the purpose of risk management plans?

Risk management plans describe the ways in which a facility reduces the likelihood of accidental releases of extremely hazardous substances and their plans for dealing with any accidental releases which may occur.

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